

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

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MARK FADLEVICH

Case No.: 1:19-cv-04227-AMD-CLP

Plaintiff,

-against-

**JD 34TH STREET REALTY LLC,
GUTMAN, MINTZ, BAKER & SONNENFELDT, LLP,
and
ERIC KEILBACH,**

Defendants.

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**STIPULATION AS TO PLAINTIFF PROPOUNDING DISCOVERY TO GUTMAN
DEFENDANTS**

The Parties enter into this following Stipulation as to Plaintiff Propounding Discovery to Gutman, Mintz, Baker & Sonnenfeldt, LLP and Eric Keilbach (collectively the “Gutman Defendants”) to attempt to minimize the accrual of attorney’s fees and case expenses in the case at bar.

The Gutman Defendants agree that they will not object as to the timeliness of discovery demands propounded by Plaintiff on or before June 19, 2023, that Plaintiff in good faith believes are related to the testimony from the upcoming 30(b)(1) and 30(b)(6) depositions of the Gutman Defendants scheduled for June 8 and 16, 2023, and will provide responses and/or raise objections (except as to timeliness) even if the deadline to respond is otherwise outside the deadline for the close of fact discovery (currently July 5, 2023).

The Parties respectfully request the Court to authorize the same by So Ordering this Stipulation.

AGREED:

Defendants Gutman, Mintz, Baker & Sonnenfeldt, LLP and Eric Keilbach

By:  Date: 6/7/23
Ken Novikoff
Rivkin Radler LLP

AGREED:

Defendant JD 34th Street Realty LLC

By: /s/ Arthur Jakoby Date: 06/09/2023
Arthur G. Jakoby
Herrick, Feinstein LLP

AGREED:

Plaintiff Mark Fadlevich

By: /s/ Ahmad Keshavarz Date: 06/15/2023
Ahmad Keshavarz
The Law Office of Ahmad Keshavarz

SO ORDERED this _____ day of _____, 2023.

Magistrate Judge Marcia M. Henry